

John C. Quinn (*pro hac vice*)
jqinn@heckerfink.com
Hyatt Mustefa (*pro hac vice*)
hmustefa@heckerfink.com
Jocelyn Hassel (*pro hac vice*)
jhassel@heckerfink.com
Tayonna Ngutter (*pro hac vice*)
tngutter@heckerfink.com
HECKER FINK LLP
350 Fifth Avenue, 63rd Floor
New York, NY 10118
Telephone: (212) 763-883

Joshua Matz (*pro hac vice*)
jmatz@heckerfink.com
Joanne Grace Dela Peña (*pro hac vice*)
jdelapena@heckerfink.com
HECKER FINK LLP
1050 K Street NW, Suite 1040
Washington, DC 20001
Telephone: (212) 763-0883

Walter F. Brown Jr. (SBN: 130248)
wbrown@paulweiss.com
**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (628) 432-5100
Facsimile: (628) 232-3101

Karen L. Dunn (*pro hac vice*)
kdunn@dirllp.com
Melissa F. Zappala (*pro hac vice*)
mzappala@dirllp.com
DUNN ISAACSON RHEE LLP
401 9th Street NW
Washington, DC 20004
Telephone: (202) 240-2900
Facsimile: (202) 240-2050

Attorneys for Plaintiff Dr. Andrew Forrest

Attorneys for Defendant Meta Platforms, Inc.

[Additional Counsel on Signature Page]

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

DR. ANDREW FORREST,

Plaintiff,

- against -

META PLATFORMS, INC.,

Defendant.

Case No. 22-cv-03699-PCP

JOINT STATUS REPORT

The Hon. Judge Virginia K. DeMarchi

1 Pursuant to this Court's May 21, 2025 Orders, *see* ECF 213; ECF 214, and June 18, 2025
2 Order, *see* ECF 223, Plaintiff Dr. Andrew Forrest and Defendant Meta Platforms, Inc. (together,
3 the "Parties"), jointly submit this status report to advise of their progress in resolving their disputes
4 regarding Plaintiff's responses to Meta's discovery requests, *see* ECF 205, and Plaintiff's proposed
5 modifications to the Amended Protective Order, *see* ECF 206.

6 With respect to the Parties' dispute regarding Plaintiff's responses to Meta's discovery
7 requests, the Parties met and conferred on May 29, 2025, regarding (i) "what searches have been
8 undertaken to date and what additional searches might be required to fully respond to Meta's
9 disputed requests for production," ECF 213 at 2; (ii) "the extent Dr. Forrest objects to any of
10 Interrogatories Nos. 1-4" and "these objections and [the Parties'] attempt to resolve them," *id.* at
11 3; and (iii) "[i]f Dr. Forrest resists Meta's discovery on the basis of attorney-client privilege or
12 work product protection, [his] support [for] the privilege or protection claimed," *id.* On June 20,
13 2025, Plaintiff sent Meta a letter describing the searches undertaken to date and made a production
14 of materials. The Parties have continued to correspond on these issues and make steady progress
15 in negotiations.

16 With respect to the Parties' dispute regarding Plaintiff's proposed modifications to the
17 Amended Protective Order, the Parties have made substantial progress on a framework of a
18 potential agreement.

19 The Parties respectfully request that the Court permit the Parties a brief period of additional
20 time to meet and confer, and respectfully propose to file another joint status report advising the
21 Court of their progress with respect to the Parties' disputes on July 15, 2025.
22
23
24
25
26
27
28

1 Dated: July 1, 2025

2 Respectfully submitted,

3 By:

4 /s/ John C. Quinn

John C. Quinn (*pro hac vice*)

jquinn@heckerfink.com

Hyatt Mustefa (*pro hac vice*)

hmustefa@heckerfink.com

Jocelyn Hassel (*pro hac vice*)

jhassel@heckerfink.com

Tayonna Ngutter (*pro hac vice*)

tngutter@heckerfink.com

HECKER FINK LLP

350 Fifth Avenue, 63rd Floor

New York, NY 10118

Telephone: (212) 763-0883

Joshua Matz (*pro hac vice*)

jmatz@heckerfink.com

Joanne Grace Dela Peña (*pro hac vice*)

jdelapena@heckerfink.com

HECKER FINK LLP

1050 K Street NW, Suite 1040

Washington, DC 20001

Telephone: (212) 763-0883

Leslie Brueckner (SBN: 140968)

lbrueckner@singletonschreiber.com

SINGLETON SCHREIBER

591 Camino de la Reina, Suite 1025

San Diego, CA 92108

Telephone: (619) 573-1851

Elizabeth Ryan (*pro hac vice*)

eryan@baileyglasser.com

BAILEY & GLASSER LLP

176 Federal Street, 5th Floor

Boston, MA 02110

Telephone: (617) 439-6730

Derek G. Howard (SBN: 118082)

derek@derekhowardlaw.com

DEREK G. HOWARD LAW FIRM, INC.

42 Miller Avenue

Mill Valley, CA 94941

Telephone: (415) 432-7192

Attorneys for Plaintiff Dr. Andrew Forrest

/s/ Walter F. Brown Jr.

Walter F. Brown Jr. (SBN: 130248)

wbrown@paulweiss.com

**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**

535 Mission Street, 24th Floor

San Francisco, CA 94105

Telephone: (628) 432-5100

Facsimile: (628) 232-3101

Amy L. Barton (*pro hac vice*)

abarton@paulweiss.com

T. Patrick Cordova (*pro hac vice*)

pcordova@paulweiss.com

**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**

1285 Avenue of the Americas

New York, NY 10019

Telephone: (212) 373-3000

Facsimile: (212) 757-3990

Karen L. Dunn (*pro hac vice*)

kdunn@dirllp.com

Melissa F. Zappala (*pro hac vice*)

mzappala@dirllp.com

DUNN ISAACSON RHEE LLP

401 9th Street NW

Washington, DC 20004

Telephone: (202) 240-2900

Facsimile: (202) 240-2050

Jacob M. Heath (SBN: 238959)

jheath@orrick.com

**ORRICK, HERRINGTON &
SUTCLIFFE LLP**

1000 Marsh Road

Menlo Park, CA 94025-1015

Telephone: (650) 614-7400

Facsimile: (650) 614-7401

Attorneys for Defendant Meta Platforms, Inc.

FILER'S ATTESTATION

I, Walter F. Brown Jr., am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: July 1, 2025

By: /s/ Walter F. Brown Jr.
Walter F. Brown Jr.